

From: Boone Brothers <Boone.Brothers@Bd.com>
Sent: Wednesday, August 26, 2020 11:28 AM
To: Taylor, Sean <Sean.Taylor@dnr.ga.gov>; Damaske, Stephen <stephen.damaske@dnr.ga.gov>
Cc: Hays, Karen <Karen.Hays@dnr.ga.gov>
Subject: Immediate notification

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Sean,

This morning in Covington we were notified of a baseline alarm indicated a level of 1.02 ppm in the drum storage area. The operator used a gas detector to identify a leak at a plug, and the level was 2.5 ppm. The operator tightened the plug and the reading was zero. Drum storage is outside and is not contained by the dry bed system. We have procedures in place for the operators to perform activities to check the connection points and sealing points of the drums with a gas detector or snoop solution when they are connected and when they are disconnected for storage. This seems to fall in line to a process similar to our LDAR program, which has a leak reporting of 50 ppm. Do you agree that this would not require a report?

On another note:

BD was performing LDAR activities at the Madison facility this morning and received a reading greater than 50 ppm. (80 ppm)

We will follow up with a report in 48 hours.

Please let me know if you have any questions or if I can help in any other way.

Sincerely,

Boone



Boone Brothers, CSP, CHMM
Sr. EHS Manager, UCC Business Unit

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Corporate Headquarters Mailing Address: BD (Becton, Dickinson and Company) 1 Becton Drive Franklin Lakes, NJ 07417 U.S.A.

From: Damaske, Stephen <stephen.damaske@dnr.ga.gov>

Sent: Wednesday, August 26, 2020 11:41 AM

To: Boone Brothers <Boone.Brothers@Bd.com>; Taylor, Sean <Sean.Taylor@dnr.ga.gov>

Cc: Hays, Karen <Karen.Hays@dnr.ga.gov>

Subject: RE: Immediate notification

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Good Morning Boone,

Thank you very much for reaching out about these incidence. I am glad to have the opportunity to clarify the reporting requirements for you. We had a discussion over the phone on August 12th and I told you I would clarify the reporting requirements based on the Division's determination of internal verses external releases and what constitutes a release to the air requiring reporting.

The Division has determined that any release that has added emissions to the environment will be reported as a release per Senate Bill 426. If internal releases occur into the dry bed systems and the dry bed systems are maintained at a destruction system equal or greater than controls that would have captured ethylene oxide from the aeration or sterilization chamber then those releases would not lead to higher emissions and would not require a reporting to the Division. However, if any released occur internally or externally and are either not controlled or controlled to a lower destruction than aeration chambers then a report should be sent to the Division with in the specified time periods.

My understanding of this release is that is occurred external to the facility with no controls and therefore should be considered a release to the air of Georgia and necessitates reporting. Thank you very much for your query and I hope this answers your question. If you have any further questions regarding this feel free to reach out.

Stephen D Damaske
Air Toxics Unit Manager
Air Protection Division
Georgia EPD
Office 404-363-7067
Fax (678) 692-6865



From: Boone Brothers
Sent: Wednesday 8/26/2020 11:48 AM
To: Damaske, Stephen; Taylor, Sean
CC: Hayes, Karen
Subject: RE Immediate notification

Stephen,

Thank you for the quick response and the clarification. Based upon that understanding we will provide reports for both of these events before the end of the day tomorrow.

Thanks again.

Take Care,

Boone



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Sr. EHS Manager, UCC Business Unit

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